

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

SANDRA J. BERRIOS,

Plaintiff

CIVIL ACTION NO. 1:11-cv-01130-AJT-IDD

v.

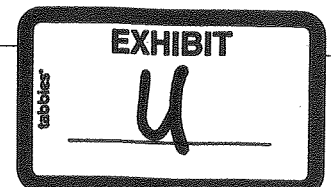
**EXPERIAN INFORMATION SOLUTIONS, INC.,
TRANS UNION, LLC., FLAGSTAR BANK, FSB,
And EQUIFAX INFORMATION SERVICES, LLC.,**

Defendants.

NOTICE OF 30(b)(6) DEPOSITION

TAKE NOTICE that on the 16th day of February 2012, at 10:00 a.m., and continuing until completed, in the law offices of SUROVELL ISAACS PETERSEN & LEVY, PLC, 4010 University Drive, Second Floor, Fairfax, Virginia 22030, Plaintiff, through her attorney, before a duly authorized Notary Public, will proceed to take the video deposition of the corporate designee of the Defendant, FLAGSTAR BANK, FSB ("FLAGSTAR") pursuant to Fed. R. Civ. P. 30(b)(6), the Plaintiff identifies the following topics on which examination will take place:

1. The history and corporate structure of Defendant Flagstar Bank, FSB and its subsidiaries, or parent companies.
2. The styles, number, allegations and outcome of consumer lawsuits filed against FLAGSTAR by other consumers during the last five years in which the consumer alleged that FLAGSTAR violated 15 U.S.C. § 1681s-2(b).
3. The manner in which FLAGSTAR informed itself of its obligations to comply with 15 U.S.C. § 1681s-2(b).
4. FLAGSTAR's knowledge and understanding of its obligations under 15 U.S.C. § 1681s-2(b) and how it obtained such understanding.



5. FLAGSTAR's knowledge and understanding of the Fourth Circuit's explanation of a furnisher's duties under 15 U.S.C. § 1681s-2(b) under the *Johnson v. MBNA* and *Saunders v. BB & T* decisions and how it obtained such understanding.
6. All actions, steps, procedures and systems that FLAGSTAR claims existed at Defendant's company to ensure that it fully understood and also complied with its duties under 15 U.S.C. § 1681s-2(b) since 2009.
7. FLAGSTAR's knowledge of the requirements of the FCRA since 2009.
8. FLAGSTAR's knowledge of the reporting requirements for the CDIA's Metro II format.
9. All facts regarding the history of the disputed FLAGSTAR mortgage account, all contacts with any person and regarding the account, and all documents regarding the account.
10. The credit reporting of the Plaintiff's account that FLAGSTAR forwarded to the Credit Reporting Agencies since January 1, 2009.
11. The full process, procedure and details of any audits made of the work of FLAGSTAR's employees who processed the ACDV disputes in this case.
12. FLAGSTAR's actual knowledge of each communication to which it was a party regarding the Plaintiff, the Plaintiff's credit reporting disputes and or the FLAGSTAR mortgage account that is the subject of this litigation.
13. The method manner and terms of compensation for each FLAGSTAR employee or ex-employee who did participate in the investigation of the Plaintiff's credit reporting disputes.
14. The meaning, content and or decoding of FLAGSTAR's records regarding the Plaintiff or the FLAGSTAR mortgage account at issue in this case, including but not limited to: ACDVs; any account database screens; and FLAGSTAR's archived investigation records.
15. FLAGSTAR's policies and or procedures for conducting investigations of consumer credit report disputes received through the consumer reporting agencies, including all details as to who conducts such disputes, the guidelines by which such disputes would be completed, all documents and records or other information considered in such investigation.
16. FLAGSTAR's best estimate of the expense and cost of each ACDV investigation to it for each ACDV dispute received regarding the Plaintiff.
17. Everything that was done regarding the Plaintiffs' disputes made pursuant to 15 U.S.C. §§1681i and 1681s-2(b), including all dates of communications or actions, all documents considered, all persons involved, the locations of all such actions, all steps taken to investigate or

verify the subject accounts and all audits or reviews by or for FLAGSTAR of these actions or events.

18. FLAGSTAR's knowledge regarding the impact of a tradeline with a CCC filed value of XB on a consumer's credit score.

19. The substance of Defendant's e-Oscar scorecard for each month since January 1, 2010.

20. All evidence, documents and proof evaluated or considered by FLAGSTAR in its decision to verify the account as accurately reported in response to the Plaintiff's credit reporting disputes (i.e. the ACDV disputes).

21. All information in the Plaintiff's credit report that FLAGSTAR now admits was inaccurate.

22. All information that FLAGSTAR sent to the national credit reporting agencies that it now admits was inaccurate.

23. The names and addresses of the person(s) at FLAGSTAR who were responsible for creating and drafting the ACDV dispute procedures followed by FLAGSTAR in this case.

24. The full background and process by which FLAGSTAR created and drafted the ACDV dispute procedures followed by FLAGSTAR in this case.

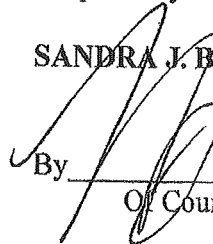
25. Your knowledge of the *Bach v. First Union* FCRA case, verdict and appeal.

26. Every action taken (or not taken) by FLAGSTAR in regard to the Plaintiff that was not as FLAGSTAR intended.

27. Every mistake that you now admit your company made with regard to the Plaintiff and/or the disputed FLAGSTAR loan.

Respectfully submitted

SANDRA J. BERRIOS,

By  _____
Of Counsel

Leonard A. Bennett, VSB #37523
CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, Virginia 23601
(757) 930-3660 - Telephone
(757) 930-3662 - Facsimile
E-mail: lenbennett@clalegal.com

Susan Rotkis, Esq. VSB #40639
CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, Virginia 23601
(757) 930-3660 - Telephone
(757) 930-3662 - Facsimile
E-mail: srotkis@clalegal.com

Kristi Cahoon Kelly, VSB #72791
SUROVELL ISAACS PETERSEN & LEVY, PLC
4010 University Drive, Second Floor
Fairfax, Virginia 22030
(703) 251-5400 - Telephone
(703) 591-9285 - Facsimile
E-mail: kkelly@siplfirm.com

Matthew James Erausquin
CONSUMER LITIGATION ASSOCIATES, P.C.
1800 Diagonal Road, Suite 600
Alexandria, VA 22314
(703) 273-6080 - Telephone
(888) 892-3512 - Facsimile
E-mail: matt@clalegal.com

Counsel for Plaintiff


CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing document has been forwarded to the following on this the 30 day of February, 2012, as follows:

George Everitt Kostel
Nelson, Mullins, Riley & Scarborough
101 Constitution Avenue, NW
Suite 900
Washington, DC 20001
E-mail George.Kostel@Nelsonmullins.com

Anitra Goodman Royster
Allston & Byrd LLP (NC)
4721 Emperor Blvd
Suite 400
Durham, NC 27703
Email: anitra.royster@alston.com

By:



Leonard A. Bennett, Esq.
VSB# 37523
CONSUMER LITIGATION
ASSOCIATES, P.C.
763 J. Clyde Morris Blvd, Suite 1-A
Newport News, VA 23601
Phone: (757) 930-3660
Fax: (757) 930-3662
lenbennett@clalegal.com